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FILE

Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of

Implementation of the Cable Television
Consumer Protection and Competition
Act of 1992

Broadcast Signal Carriage Issues

MM Docket No. 92-259

COMMENTS OF TRIPLETT & ASSOCIATES, INC.

RE

REVISIONS TO UP-DATE SECTION 76.51 OF THE RULES

Triplett & Associates, Inc., Debtor-in-Possession, licensee of Station WWAT(TV), Chillicothe, Ohio, by its counsel, respectfully submits its comments directed to the matter of the up-date of Section 76.51 of the Commission's Rules, as proposed and discussed at paragraphs 21 through 23 of the Notice in this proceeding.¹

1. Triplett strongly urges that the Columbus, Ohio, market, as designated in Section 76.51 of the Rules, be redesignated the Columbus-Chillicothe, Ohio, market, ranked as the 34th television market. The reasons dictating this action are set forth in Triplett's "Petition for Rule Making on Behalf of

¹ Notice of Proposed Rule Making, MM Docket No. 92-259, released November 19, 1992.

No. of Copies rec'd 045
List A B C D E

Triplett & Associates", filed April 19, 1988; "Supplement to Petition for Rule Making", filed July 21, 1991, and "Second Supplement to Petition for Rule Making", being simultaneously filed, of which copies are attached and form a part hereof.

2. As set forth in the foregoing pleadings, the redesignation requested is a matter of (a) making possible the receipt of the programming of Station WWAT by a large population which it is licensed to serve but which cannot receive its programs now due to the present designation of the market as merely Columbus and (b) the survival of Station WWAT and the continuation of its service to the populations which receive it now.

Respectfully submitted,

**TRIPLETT & ASSOCIATES, INC.,
DEBTOR-IN-POSSESSION**



Roy F. Perkins, Jr.

1724 Whitewood Lane
Herndon, Virginia 22070
(703) 435-9700
Its Attorney

January 4, 1993

Before the
Federal Communications Commission

Washington, D.C. 20554

RECEIVED
APR 19 1988
Federal Communications Commission
Office of the Secretary

In the Matter of)

Amendment of Section 76.51,)
Major Television Markets)
(Columbus-Chillicothe, Ohio))

RM-

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING
ON BEHALF OF
TRIPLETT & ASSOCIATES

April 19, 1988

Roy F. Perkins, Jr.
1724 Whitewood Lane
Herndon, Virginia 22070

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SUMMARY OF ARGUMENT

This Petition is filed on behalf of the licensee of Station WWAT(TV), Chillicothe, Ohio. It requests redesignation of the major television market of Columbus, Ohio, in Section 76.51 of the Rules, to be the Columbus-Chillicothe, Ohio, market.

Columbus and Chillicothe constitute a single television market. Arbitron lists Ross County, wherein Chillicothe is located, as part of the Columbus, Ohio, television market. The signals of television stations licensed to each city provide coverage to the other. Station WWAT, Chillicothe, has Grade A coverage, and partial City Grade coverage, over Columbus, Ohio.

Station WWAT is a new television station, having commenced operation less than one year ago. Service to the Columbus metropolitan area is critical to the economic viability of the station. Access to the Columbus market, however, is largely controlled by CATV systems, which serve approximately half the homes in that market. Station WWAT must be carried on the CATV systems to reach those homes.

A serious and constant threat to the carriage of Station WWAT by the Columbus CATV systems is the fact that under the copyright law, Station WWAT is a "distant" signal, as a result of which the CATV systems must pay large copyright royalty fees to carry the programs of WWAT. The fees mean, to the best of the petitioners' knowledge, that WWAT will not be carried by one of the CATV systems (which presently does not carry WWAT). They

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seriously impact the ability of Station WWAT to compete for advertising revenue due to the inability to state with any degree of assurance what its future reach to television homes will be. Loss of all CATV carriage, which is possible, would threaten the existence of WWAT.

Station WWAT is in direct competition with network and independent stations serving the Chillicothe metropolitan market which can be, and are, carried on all the Chillicothe CATV systems without payment of copyright royalty fees. To serve that audience, which it is licensed to serve, and be able to compete on an approximately equal basis, Station WWAT should be available for CATV carriage on the same copyright royalty-free basis.

Station WWAT, having Grade A and partial City Grade coverage over the Columbus metropolitan market, when it acquires programming must pay for the rights for use of that programming in that market. In other words, the program rights which WWAT must purchase include payments to the copyright holders for the right of use in the Columbus market. It is arbitrary and unreasonable that it should be faced with the burden of a second round of royalty payments for access to the CATV homes in that market.

Redefinition of the Columbus major television market to include Chillicothe, Ohio, will enable the Columbus CATV systems to carry the programs of Station WWAT without incurring liability for copyright royalty fees, and eliminate the severe competitive inequality on that ground which presently exists.

Before the
Federal Communications Commission

Washington, D.C. 20554

In the Matter of)	
)	
Amendment of Section 76.51,)	RM-
Major Television Markets)	
(Columbus-Chillicothe, Ohio))	

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

Triplett & Associates, licensee of Television Station WWAT, Channel 53, Chillicothe, Ohio, by its counsel, respectfully requests issuance of a notice of proposed rule making to amend Section 76.51, "Major television markets", with respect to Columbus and Chillicothe, Ohio, as follows:

Present: (27) Columbus, Ohio

Proposed: (27) Columbus-Chillicothe, Ohio

In support whereof, Triplett & Associates states as follows:

I. **COLUMBUS AND CHILLICOTHE, OHIO, CON-
STITUTE A SINGLE TELEVISION MARKET**

1. It is only about 45 miles from Chillicothe, Ohio, to the center of Columbus. The Grade B coverage contours of the

Columbus VHF television stations include Chillicothe and most of Ross County wherein Chillicothe is situated. Attachments A-1, A-2 and A-3. Conversely, the Grade A contour of Station WWAT includes Columbus. The City Grade contour of Station WWAT includes approximately half of that city. Attachment B.¹

2. The Arbitron designation of the Columbus, Ohio, market includes Ross County, wherein Chillicothe is situated. Station WWAT, Chillicothe, is listed as a station in the Columbus television market. Attachment D.

3. The Grade B contour of Station WWAT lies almost entirely within the Columbus television market, as defined by Arbitron. Attachments B and D. Station WWAT's Grade B coverage principally includes all or substantially all of Franklin County (wherein Columbus is situated), Ross, Pike, Pickaway, Fayette, Madison, Hocking and Fairfield Counties. All of them are included by Arbitron in the Columbus, Ohio, market. These counties contain more than 70 percent of all television homes in the market. Attachment D.

¹ Station WWAT has been granted a construction permit for an increase in antenna height. File No. BMPCT-870610KK. When that is implemented, Station WWAT will have City Grade coverage over all of Columbus (Attachment C) and meet the technical qualifications to be a Columbus station.

II. STATION WWAT SERVES THE COLUMBUS, OHIO, TELEVISION MARKET, DERIVES ITS FINANCIAL SUPPORT FROM THAT MARKET AND COMPETES FOR AUDIENCE AND REVENUE WITH OTHER TELEVISION STATIONS IN THAT MARKET

4. As is apparent from the foregoing, Station WWAT has extensive coverage in the Columbus, Ohio, television market, including Grade A and, in part, City Grade coverage over Columbus, Ohio, the major city in the market. It is, accordingly, licensed to provide service to the populations in that market including in its principal city, Columbus.

5. Station WWAT is an independent (non-network affiliated) station. Accordingly, it must purchase programming in order to provide a basic programming format. To do so, having extensive coverage of the Columbus market (including Grade A and City Grade coverage over Columbus), it must compete with other television stations in the Columbus market, including those licensed to Columbus, for the rights to present such programming. Similarly, it must pay for those rights based on the market size of Columbus and the large population in that television market. More specifically, it must purchase programming, and pay the price, for the rights to presentation in the major television market of Columbus.

6. As a television service to Columbus and the Columbus television market, Station WWAT must be able to compete with other television stations in the market for audience. The size of the audience which it can attract with its programming deter-

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mines the ability of Station WWAT to sell advertising and program time, and the rates it can charge for such time, and, ultimately, the revenues which Station WWAT can achieve. Station WWAT is a commercial television station. The revenues which Station WWAT can achieve are necessary for its survival and determine the quality of the programming and service which it can provide.

7. Further, Columbus, as the commercial center of the area, is the principal source of the businesses and advertising which will support independent television service in the market. Those who place such advertising are deterred from doing so with Station WWAT if it is not fully available to all television households in metropolitan Columbus.

8. To be able to provide programming of the quality to attract an audience and serve the public interest in the Columbus market, Station WWAT must be able to reach the audience in the Columbus market including, in particular, the audience in the population center, metropolitan Columbus. Without the ability to fairly compete for that audience, **which constitutes approximately 75% of all television homes within Station WWAT's Grade B contour**, the very existence of Station WWAT is threatened.²

² Attachment D. The television households in Franklin County, which constitutes Columbus and its suburbs, are 356,000. This is more than 75% of all television households, totalling 469,400, in the counties principally included (para. 3, supra) within the Grade B contour of Station WWAT.

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**III. THERE IS A MAJOR COMPETITIVE IMBALANCE
IN THE COLUMBUS, OHIO, TELEVISION MARKET
WHICH THREATENS THE SURVIVAL OF STATION
WWAT**

9. Columbus, Ohio, and Franklin County, which constitutes substantially metropolitan Columbus, are served by four (4) CATV (community antenna television) systems. Collectively, they serve approximately half of the television households in Columbus and its suburbs, as follows (Attachment E):

<u>CATV System</u>	<u>Total Subscribers</u>
All-American Cablevision	36,500
Coaxial Communications	59,206
Tele-Media Corp.	16,356
Warner Cable of Columbus	<u>64,500</u>
Total	<u>176,562</u>

The foregoing total subscribers to these four CATV systems equals **49.6%** of the television homes in Franklin County (Attachment D) and **37.6%** of the television homes in all counties which Station **WWAT** principally serves within its Grade B contour (para. 3, supra, and Attachment D).

10. As the Commission is aware, CATV systems, including those (above) serving Columbus, Ohio, and the Columbus metropolitan area, are the means of access by local television stations to that part of the population which they are licensed to serve which subscribes to CATV service. Households which decide to utilize CATV service generally rely exclusively on that service and no longer utilize - and usually do not have the tech-

nical facilities to utilize - off-the-air television service.³

11. The foregoing CATV systems carry the programs of all of the local television stations. This includes the programming of the three Columbus VHF network stations and of the two local independent UHF stations, WTTE, Columbus, and WSFJ, Newark, Ohio. Attachment E. Thus, the CATV systems provide these stations with access to their potential audiences who receive service by CATV, affording these stations the access to the populations they are licensed to serve approximating that which they would have in the absence of the interposition of the CATV systems. The carriage by the CATV systems of all of the local stations, permitting all of them to reach the audiences within their coverage contours, provides competitive equality among them, similar to that which they would enjoy if television service in the market were universally received by off-the-air reception.

12. Only three of the Columbus CATV systems now carry the programming of Station WWAT. Coaxial Communications, with 59,206 subscribers, does not carry the programs of WWAT, resulting in the loss by Station WWAT of approximately 59,206 households.

³ This fact is the basis for the Commission's current rule requiring, on a long-term basis, the availability of the so-called "A-B" switch for CATV subscribers who desire it. The purpose of the switch, where installed, is to permit a CATV subscriber, assuming the subscriber also has an adequate antenna and lead wire from the antenna to his television set, to also receive television signals off-the-air. As yet, there is no evidence of the extent to which CATV subscribers (1) will elect to have this additional installation (switch, antenna and additional lead wire) and, as to those which do, (2) actually utilize off-the-air reception (as opposed to their CATV service) in practise.

This is 12.6% of the television households in the counties principally served by Station WWAT (para. 3, supra, and Attachment D) and 17.1% of the television households in Franklin County, i. e., metropolitan Columbus (Attachment D). It is unknown whether the other three Columbus CATV systems will continue to carry the programs of Station WWAT. They may decide to discontinue carriage of Station WWAT. Should this occur, Station WWAT would lose access to approximately 176,562 television homes in the Columbus market (para. 9, supra), constituting 49.6% of the television homes in Franklin County, i. e., metropolitan Columbus and 37.6% of all television households in all the counties which Station WWAT principally serves (Ibid). It is doubtful if Station WWAT can survive if this occurs and its ability to provide service clearly would be drastically impaired, at the minimum.

13. The foregoing peril of disaster to Station WWAT exists because, under the copyright law, Station WWAT is characterized as a "distant" signal; therefore, for carriage of WWAT, the CATV systems will be required to pay copyright royalty fees. This is true because (1) Station WWAT is not licensed to Columbus and (2) the Columbus market, as now specified by the Commission in Section 76.51 of the Rules, does not include Chillicothe.⁴ The peril to Station WWAT is very real and constant: it is estimated

⁴ It is true for the additional reason that the CATV systems serving Columbus are not within 35 miles of Chillicothe. The 35 mile zone for Chillicothe reaches only about 3 miles into Franklin County, failing to reach most of the county, and does not reach the city limits of Columbus.

that the minimum copyright royalty fees which the four Columbus CATV systems collectively would be required to pay for carriage of Station WWAT, under the present state of Section 76.51 of the Commission's Rules, is \$279,642 per year.⁵ The three CATV systems which presently carry the programs of Station WWAT will pay an estimated minimum, collectively, in copyright royalty fees of \$159,760 annually to do so (see fn. 5, supra).

14. Station WWAT, pursuant to the foregoing, is operating under an unfair and potentially terminal competitive imbalance, resulting from the effect of a Commission rule adopted long before Station WWAT existed. The effects of this imbalance are:

- (a) Station WWAT cannot reach a large segment of the population which it was licensed to serve, presently some 59,206 homes in the core market of

⁵ For determination of CATV royalty payments under the copyright law, Station WWAT, as a UHF independent television station having Grade B or better coverage over the Columbus CATV systems, is characterized as having a "qualifying" distant signal. It is assumed that the CATV systems are carrying at least one "qualifying" distant television signal but no more than three of them, so that WWAT would constitute not more than the 4th "qualifying" distant signal carried by any of them. The total copyright fees per signal for carriage of the 2nd through 4th "qualifying" television signal is 0.940% of the gross revenue of the CATV system.

The published base monthly charges of the Columbus CATV systems, multiplied by 12 for the months in the year and multiplied by their published numbers of subscribers (Attachment E), gives figures for annual revenues of the four Columbus CATV systems which total \$29,749,150. This, multiplied by the per signal copyright charge (above) for the 2nd through 4th "qualifying" distant signal, gives annual copyright royalty payments for carriage of Station WWAT of \$279,642. The royalty payments actually would be expected to be significantly greater once revenues from supplemental CATV services are included.

Columbus. To the best of the knowledge and belief of the petitioners, there is little, if any, possibility that this situation will change so long as the CATV system (Coaxial Communications) would be required to pay copyright royalty fees for carriage of Station WWAT.

- (b) Because of the foregoing, Station WWAT is deprived of a major part of its market support even though it must pay for its programming based on its coverage and service to that market.
- (c) Station WWAT, as an independent (non-network) station, is in direct competition with other independent stations serving the same market which have access to the entire audience in that market because their programs are carried, free of copyright royalty fee payments, by the CATV systems. Paras. 11 and 13, supra.
- (d) Station WWAT faces a further severe competitive disadvantage in that it cannot represent to potential advertisers with any degree of assurance what its reach to television homes will be in the Columbus metropolitan area. While its programs presently are carried by three of the Columbus CATV systems, those systems have a clear motive - eliminating onerous copyright royalty

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payments - to discontinue carriage of WWAT.⁶ As previously set forth herein, elimination of WWAT by the three Columbus CATV systems which presently carry its programs would drastically reduce WWAT's potential audience, especially in Columbus, and drastically reduce the value of its service to advertisers. This uncertainty as to what its audience reach will be severely impacts the present ability of Station WWAT to sell advertising.

IV. GOOD CAUSE HAS BEEN SHOWN FOR SPECIFICATION OF THE COLUMBUS-CHILLICOTHE MAJOR TELEVISION MARKET

15. Based on the foregoing, good cause exists for designation of the Columbus-Chillicothe, Ohio, major television market. First, there was no television station at Chillicothe, Ohio, when the present designation of the Columbus, Ohio, market was made. Station WWAT, Chillicothe, commenced operation less than a year ago, presenting a situation which did not previously exist. Second, it is clear that Columbus and Chillicothe, Ohio, comprise a single television market. Chillicothe and Ross Coun-

⁶ Liability for copyright royalty payments occurs in periods of six months. Carriage of a station at any time in that period causes the liability to attach for royalty payments for the entire six months period. The next such period begins July 1, 1988. Therefore, it is possible that on July 1, 1988, carriage of Station WWAT will be discontinued by one or more of the three Columbus CATV systems which presently carry its programs.

ty, wherein Chillicothe is situated, are part of the Columbus market as designated by Arbitron. Station WWAT is listed as a station in the Columbus market. The Grade B coverage of the three Columbus VHF television stations include Chillicothe. The Grade A and City Grade coverage contours of Station WWAT include all and substantial parts, respectively, of Columbus. The coverage areas of Station WWAT and the Columbus stations overlap and include large coverage areas in common. Paras. 1 - 3, supra.

16. Other indicia indicating that the public interest would be served by such a designation are present:

- (a) Columbus and Chillicothe are, in terms of the coverage of television stations, not distant from each other. They are only about 45 miles, center to center, apart. This compares favorably with other cases where hyphenated major markets have been designated. Orlando-Daytona Beach-Melbourne-Cocoa, Florida, 102 F.C.C.2d 1062, 57 R.R.2d 685 (1985) (approx. 55 miles, Melbourne to Orlando, center to center⁷); Fresno-Visalia, California, 57 R.R.2d 1122 (1985) (slightly more than 35 miles).
- (b) No obligation to carry the programming of Station WWAT or to pay copyright royalty fees resulting from such carriage will be imposed on any CATV system. No expansion of Station WWAT's market

⁷ Judicial notice requested.

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will be mandated. While market expansion and imposition of mandatory carriage on CATV systems outside a station's Grade B coverage area and/or 35 mile zone was a consideration in the cases cited, supra, under the Commission's former "must-carry" CATV rules, there no longer are "must-carry" rules. Therefore, there is no possibility that any carriage requirement will be imposed on any CATV system (and no mandatory increase in the coverage area of Station WWAT can arise).

(c) Station WWAT has a clear and compelling need for the market redesignation requested. As a new UHF television station, it needs at least a "level playing field" to secure an audience and establish itself economically. All other stations serving Columbus are carried, without royalty fees, on the Columbus cable systems. WWAT alone of all television stations serving Columbus is "fee-chargeable".

(d) The risk of loss of all carriage by Station WWAT on Columbus CATV systems is severe. WWAT is an independent (non-network) station but there are two other local independent television stations available for CATV carriage at no cost in the Columbus market. In addition, the Columbus CATV systems all carry one or more "super-stations"

(such as WTBS, Atlanta), as well as other CATV program services, for which they must pay. Attachment E. WWAT is not in a position to compete for CATV carriage with those services. It will hardly be surprising under these circumstances if the CATV systems decide not to carry the programs of Station WWAT where they must pay substantial fees - possibly exceeding the charges they pay for equally or more desirable CATV program services - to do so.

- (e) The public will benefit from the market redesignation requested. It will remove a major handicap imposed by the present market designation to receipt by CATV subscribers in the Columbus, Ohio, market of television service licensed to serve them. Further, it will materially assist Station WWAT in attempting to establish itself as an independent television station providing a additional service throughout its service area.
- (f) Finally, Station WWAT already pays, when it purchases its programming, for the rights protected by the copy-right law including, in particular, to present those programs in the Columbus market. Those rights have been negotiated with the copy-right owners and agreements reached on the charges to be paid for them before the television rights are sold to Station WWAT. It is arbitrary

and unreasonable that the programs of Station WWAT should be subjected twice to the payment of copy-right charges for the same market. It is arbitrary and unreasonable that where Station WWAT is licensed to serve the Columbus metropolitan area, and has contracted to pay the charges of the copyright owners for the rights to present programming to the Columbus metropolitan area, it should be subject to loss of access to a large part of that market (and the populations therein to loss of service from Station WWAT) if copyright royalty fees are not paid for the same rights.

CONCLUSION

WHEREFORE, it is respectfully submitted that good cause has been shown for issuance of a notice of proposed rule making to amend Section 76.51 of the Rules to include therein the Columbus-Chillicothe television market.

Respectfully submitted,
TRIPLETT & ASSOCIATES*

Roy F. Perkins, Jr.

1724 Whitewood Lane
Herndon, Virginia 22070
Their Attorney

April 19, 1988

WBNS-TV

Ch. 10

Network Service: CBS.

Licensee: WBNS-TV Inc., 770 Twin Rivers Dr., Box 1010, Columbus, OH 43216.

Studio: 770 Twin Rivers Dr., Columbus, OH 43216.

Telephone: 614-460-3700. TWX: 810-482-1619.

Mailing Address: Box 1010, Columbus, OH 43216.

Technical Facilities: Channel No. 10 (192-198 MHz). Authorized power: 316-kw visual, 31.6-kw aural. Antenna: 890-ft. above av. terrain, 1029-ft. above ground, 1749-ft. above sea level.

Latitude 39° 58' 16"
Longitude 83° 01' 40"

Transmitter: 776 Twin Rivers Dr.

Multichannel TV Sound: Stereo only.

Satellite Earth Stations: Harris, 6.1-meter C-band; Harris, 6.1-meter Ku-band; Harris receivers.

AM Affiliate: WBNS, 5-kw (1-kw night) 1460 kHz.

FM Affiliate: WBNS-FM, 16-kw, 97.1 MHz (No. 246), 780-ft.

News Services: AP, CBS, CNN, CNN Headline News.

Ownership: WBNS-TV Inc. All outstanding stock in WBNS-TV Inc. is owned by Dispatch Printing Co., publishers of Columbus Dispatch, John F. Wolfe, publisher. The Dispatch Printing Co. also owns VideoIndiana Inc., licensee of WTHR(TV), Indianapolis, IN.

Began Operation: Oct. 5, 1949.

Represented (sales): Blair Television; Paul Mulvihill & Co. Ltd. (Canada).

Represented (legal): Crowell & Moring.

Represented (engineering): David Steel & Associates.

Personnel:

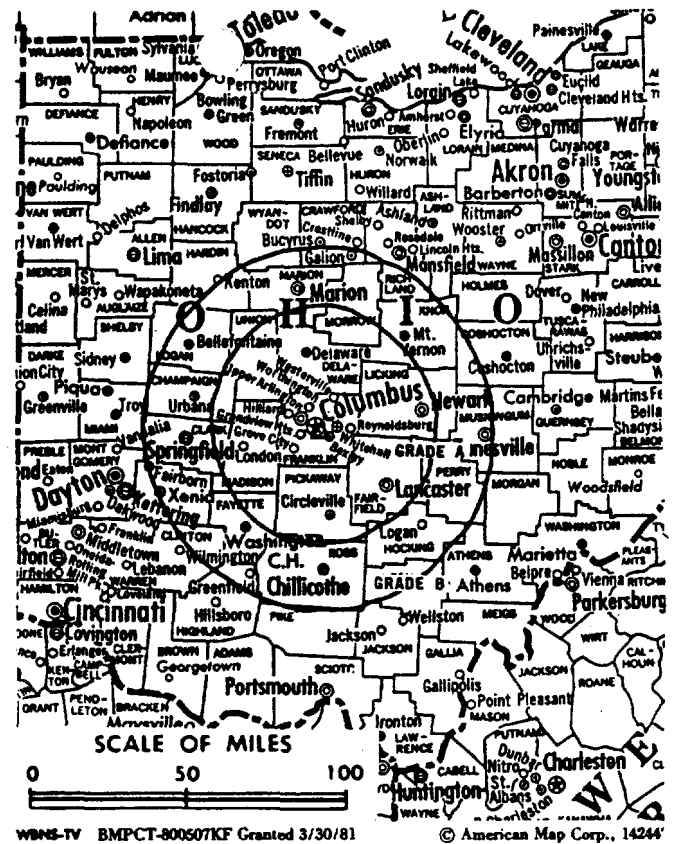
EUGENE D'ANGELO JR., president & general manager.
LARRY MAISEL, vice president, news & station manager.
ROBERT FOSTER, general sales manager.
JOHN A. HALDI, vice president, programs.
WILLIAM ORR, vice president, engineering.
JERRY CARY, treasurer.
MARIO HEWITT, national sales manager.
JAMES R. LYNCH, local sales manager.
STEVE WILKENS, director of marketing & promotion.
MIKE BERRY, production manager.
CHARLES WHITE, public service director.

Highest 30 Sec. Rate: \$2000.

NETWORK BASE HOURLY RATE: \$2035.

Total Households: © MSI Consumer Market Data as of 1/1/86. TV Homes, TV% and Circulation © 1986 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Crawford	18,300	18,000	98
	Delaware	20,300	20,100	99
	Fairfield	35,600	35,200	99
	Fayette	10,100	9,900	98
	Franklin	347,300	343,100	99
	Hardin	11,800	11,600	98
	Hocking	9,800	9,600	98
	Knox	17,300	17,000	98
	Licking	46,300	45,700	99
	Logan	15,300	15,000	98
	Madison	11,600	11,300	97
	Marion	24,400	24,100	99
	Morgan	5,400	5,200	96
	Morrow	9,900	9,800	99
	Muskingum	31,500	30,900	98
	Perry	11,600	11,400	98
	Pickaway	14,900	14,700	99
	Pike	8,800	8,500	97
	Ross	23,700	23,200	98



Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Scioto	31,400	30,700	98
	Union	10,900	10,700	98
	Vinton	4,400	4,300	98
	Wyandot	8,000	7,800	98
	OHIO			
Between 25-49%	Athens	19,000	18,400	97
	Auglaize	15,700	15,400	98
	Champaign	12,800	12,600	98
	Clark	54,300	53,700	99
	Coshocton	13,800	13,400	97
	Guernsey	15,900	15,500	97
	Highland	13,300	13,000	98
	Jackson	11,400	11,100	97
	Richland	48,200	47,500	99
	Washington	23,900	23,200	97
	WEST VIRGINIA			
	Wood	35,200	34,800	99
Between 5-24%	OHIO			
	Adams	9,200	8,800	96
	Allen	41,100	40,400	98
	Ashland	16,700	16,500	99
	Clinton	13,200	13,000	98
	Gallia	11,200	10,900	97
	Greene	45,700	45,100	99
	Hancock	24,600	24,300	99
	Holmes	9,000	8,500	94
	Lawrence	23,800	23,300	98
	Meigs	9,100	8,900	97
	Miami	33,600	33,200	99
	Noble	4,200	4,000	95
	Shelby	15,400	15,200	99
	WEST VIRGINIA			
	Mason	10,000	9,900	99
Station Totals		1,258,900	1,238,400	98
Net Weekly Circulation (1986)			760,500	
Average Daily Circulation (1986)			464,200	

Ohio—Columbus

WCMH-TV

Ch. 4

Network Service: NBC.

Licensee: Outlet Communications Inc., 3165 Olentangy River Rd., Columbus, OH 43202.

Studio: 3165 Olentangy River Rd., Columbus, OH 43202.

Telephone: 614-263-4444.

Technical Facilities: Channel No. 4 (66-72 MHz). Authorized power: 100-kw visual, 15-kw aural. Antenna: 903-ft. above av. terrain, 876-ft. above ground, 1749-ft. above sea level.

Latitude 39° 58' 15"
Longitude 83° 01' 39"

Transmitter: 766 Twin Rivers Dr., Columbus.

Multichannel TV Sound: Stereo only.

Satellite Earth Stations: Scientific-Atlanta, 10-meter; Harris & Scientific-Atlanta receivers.

News Services: AP, NBC, UPI, Group W Newsfeed.

Ownership: Outlet Communications Inc. For officers & other interests, see WJAR-TV, Providence, RI & Group Ownership of TV Stations.

Began Operation: April 3, 1949. Sale to The Outlet Co. by Avco Bcstg. Corp. approved by FCC Dec. 22, 1975 (Television Digest, Vol. 15:21,52). Sale to Rockefeller Group approved Nov. 23, 1983 (Vol. 23:19,22; 26:6). Sale by Rockefeller Group approved April 29, 1986.

Represented (sales): Katz Television.

Represented (legal): Sundlun, Scher & Singer.

Personnel:

BRUCE G. SUNDLUN, chairman & chief executive officer.
DAVID E. HENDERSON, president & chief operating officer.
GARY ROBINSON, vice president & general manager.
JEFFREY M. CASH, general sales manager.
DON BERMAN, national sales manager.
RALPH O. LANDON, chief engineer.
DORIS DUPEE, business manager.
GEORGE TYLL, news director.
ROD PORTER, promotion manager.
BOB SHAW, operations manager.
PAUL ERNST, production manager.

Highest 30 Sec. Rate: \$2000.

NETWORK BASE HOURLY RATE: \$2100.

Total Households: © MSI Consumer Market Data as of 1/1/86. TV Homes, TV% and Circulation © 1986 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Champaign	12,800	12,600	98
	Coshocton	13,800	13,400	97
	Crawford	18,300	18,000	98
	Delaware	20,300	20,100	99
	Fairfield	35,600	35,200	99
	Fayette	10,100	9,900	98
	Franklin	347,300	343,100	99
	Hocking	9,800	9,600	98
	Knox	17,300	17,000	98
	Licking	46,300	45,700	99
	Madison	11,600	11,300	97
	Marion	24,400	24,100	99



Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Morgan	5,400	5,200	96
	Morrow	9,900	9,800	99
	Muskingum	31,500	30,900	98
	Perry	11,600	11,400	98
	Pickaway	14,900	14,700	99
	Pike	8,800	8,500	97
	Richland	48,200	47,500	99
	Ross	23,700	23,200	98
	Union	10,900	10,700	98
Between 25-49%	OHIO			
	Athens	19,000	18,400	97
	Clark	54,300	53,700	99
	Guernsey	15,900	15,500	97
	Hardin	11,800	11,600	98
	Jackson	11,400	11,100	97
	Logan	15,300	15,000	98
	Vinton	4,400	4,300	98
	Wyandot	8,000	7,800	98
Between 5-24%	OHIO			
	Adams	9,200	8,800	96
	Auglaize	15,700	15,400	98
	Clinton	13,200	13,000	98
	Highland	13,300	13,000	98
	Holmes	9,000	8,500	94
	Noble	4,200	4,000	95
	Tuscarawas	33,000	32,300	98
Station Totals		970,200	954,300	98
Net Weekly Circulation (1986)				689,600
Average Daily Circulation (1986)				423,000

Ohio—Columbus

WTVN-TV

Ch. 6

Network Service: ABC.

Licensee: Taft Television & Radio Co. Inc., 1261 Dublin Rd., Columbus OH 43215.

Studio: 1261 Dublin Rd., Columbus, OH 43215.

Mailing Address: Box 718, Columbus, OH 43216.

Telephone: 614-481-6666. TWX: 614-759-0448.

Technical Facilities: Channel No. 6 (82-88 MHz). Authorized power: 100-kw visual, 20-kw aural. Antenna: 535-ft. above av. terrain, 672-ft. above ground, 1400-ft. above sea level.

Latitude 40° 01' 02"
Longitude 83° 01' 07"

Transmitter: 350 W. Dodridge St.

Satellite Earth Stations: Harris, 9-meter; Harris receivers.

AM Affiliate: WTVN, 5-kw, 610 kHz (ABC).

FM Affiliate: WLWQ, 40-kw, 96.3 MHz (No. 242), 550-ft.

News Services: AP, UPI.

Ownership: Taft Television & Radio Co. Inc. For other interests, see Group Ownership of TV Stations.

Began Operation: Sept. 29, 1949. Sale to present owners by Picture Waves Inc. approved by FCC Feb. 25, 1953 (Television Digest, Vol.9:9).

Represented (sales): MMT Sales Inc.

Represented (legal): Koteen & Naftalin.

Represented (engineering): Cohen & Dippell.

Personnel:

CHARLES R. WING, vice president & general manager.

JAMES CONSCHAFER, general sales manager.

RUSS READ, program manager.

KATHY WARD, publicity & promotion director.

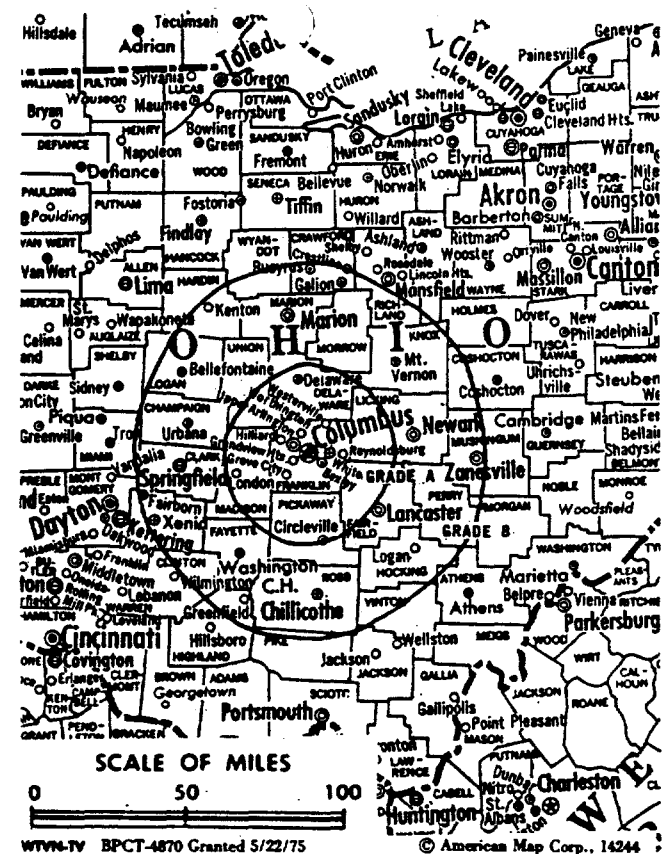
BRIAN BRACCO, news director.

Highest 30 Sec. Rate (July 18, 1985): \$5000.

NETWORK BASE HOURLY RATE: \$1800.

Total Households: © MSI Consumer Market Data as of 1/1/86. TV Homes, TV% and Circulation © 1986 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Crawford	18,300	18,000	98
	Delaware	20,300	20,100	99
	Fairfield	35,600	35,200	99
	Fayette	10,100	9,900	98
	Franklin	347,300	343,100	99
	Hocking	9,800	9,600	98
	Knox	17,300	17,000	98
	Licking	46,300	45,700	99
	Madison	11,600	11,300	97
	Marion	24,400	24,100	99
	Morgan	5,400	5,200	96
	Morrow	9,900	9,800	99
	Muskingum	31,500	30,900	98
	Perry	11,600	11,400	98
	Pickaway	14,900	14,700	99
	Pike	8,800	8,500	97
	Richland	48,200	47,500	99
	Ross	23,700	23,200	98



Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	Union	10,900	10,700	98
	OHIO			
	Between 25-49%			
	Athens	19,000	18,400	97
	Champaign	12,800	12,600	98
	Clark	54,300	53,700	99
	Hardin	11,800	11,600	98
	Jackson	11,400	11,100	97
	Logan	15,300	15,000	98
	Vinton	4,400	4,300	98
	Washington	23,900	23,200	97
	Wyandot	8,000	7,800	98
	WEST VIRGINIA			
	Wood	35,200	34,800	99
Between 5-24%	OHIO			
	Ashland	16,700	16,500	99
	Clinton	13,200	13,000	98
	Coshocton	13,800	13,400	97
	Greene	45,700	45,100	99
	Guernsey	15,900	15,500	97
	Highland	13,300	13,000	98
	Holmes	9,000	8,500	94
	Meigs	9,100	8,900	97
	Miami	33,600	33,200	99
	Noble	4,200	4,000	95
	Scioto	31,400	30,700	98
	WEST VIRGINIA			
	Jackson	9,400	9,300	99
	Mason	10,000	9,900	99
Station Totals		1,127,300	1,109,400	98
Net Weekly Circulation (1986)			682,700	
Average Daily Circulation (1986)			376,900	

WTTE

Ch. 28

Network Service: None, independent.

Licensee: WTTE Channel 28 Inc., 6130 Sunbury Rd., Box 280, Columbus, OH 43216.

Studio: 6130 Sunbury Rd., Columbus, OH 43081.

Telephone: 614-895-2800.

Technical Facilities: Channel No. 28 (554-560 MHz). Authorized power: 1910-kw max. visual, 383-kw max. aural. Antenna: 965-ft. above av. terrain, 1124-ft. above ground, 2044-ft. above sea level.

Latitude 40° 09' 33.5"

Longitude 82° 55' 21.5"

Transmitter: 6680 State Rte. 3, Westerville.

Satellite Earth Stations: Harris, 3-meter & 6.1-meter; Microdyne Ku-Band; Microdyne receivers.

News Service: INN.

Ownership: Commercial Radio Institute Inc. See WBFF(TV), Baltimore, MD; WPTT-TV, Pittsburgh, PA & Group Ownership of TV Stations.

Began Operation: June 1, 1984.

Represented (sales): Seitel Inc.

Represented (legal): Fisher, Wayland, Cooper & Leader.

Represented (engineering): Carl T. Jones Corp.

Personnel:

ROBERT L. SIMMONS, vice president & general manager.

JOHN T. QUIGLEY, station manager.

STEVE MARKS, general sales manager.

MICHAEL C. SUMMERS, local sales manager.

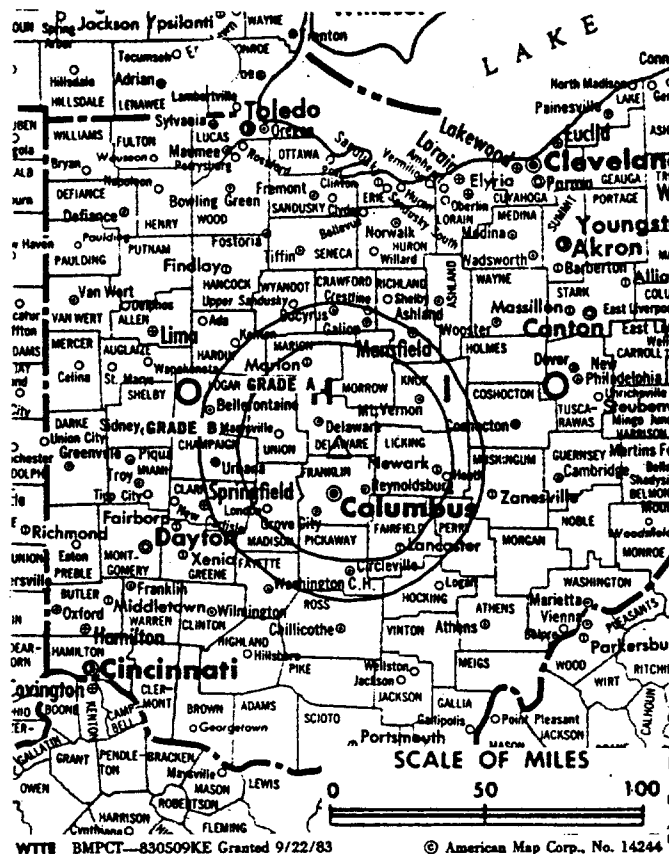
ORAN GOUGH, operations director.

JOE SUBICH, chief engineer.

Highest 30 Sec. Rate: \$1000.

Total Households: © MSI Consumer Market Data as of 1/1/86. TV Homes, TV% and Circulation © 1986 Arbitron. County coverage based on Arbitron study.

Net Weekly Circulation	State County	Total Households	TV Households	%
50% & Over	OHIO			
	Delaware	20,300	20,100	99
	Fairfield	35,600	35,200	99
	Franklin	347,300	343,100	99
	Knox	17,300	17,000	98
	Madison	11,600	11,300	97
	Marion	24,400	24,100	99
	Morrow	9,900	9,800	99
	Pickaway	14,900	14,700	99
	Union	10,900	10,700	98



Net Weekly Circulation	State County	Total Households	TV Households	%
Between 25-49%	OHIO			
	Licking	46,300	45,700	99
Between 5-24%	OHIO			
	Champaign	12,800	12,600	98
	Crawford	18,300	18,000	98
	Fayette	10,100	9,900	98
	Guernsey	15,900	15,500	97
	Hardin	11,800	11,600	98
	Highland	13,300	13,000	98
	Hocking	9,800	9,600	98
	Holmes	9,000	8,500	94
	Logan	15,300	15,000	98
	Morgan	5,400	5,200	96
	Muskingum	31,500	30,900	98
	Perry	11,600	11,400	98
	Richland	48,200	47,500	99
	Ross	23,700	23,200	98
	Wyandot	8,000	7,800	98
Station Totals		783,200	771,400	98
Net Weekly Circulation (1986)			348,900	
Average Daily Circulation (1986)			150,000	

